

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

AT&T SERVICES, INC., AT&T
MOBILITY, LLC and AT&T CORP.,

Defendants.

Civil Action No. 2:23-cv-00397-JRG-RSP

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND THE DOCKET CONTROL ORDER

Plaintiff Headwater Research LLC and Defendants AT&T Services, Inc., AT&T Mobility, LLC and AT&T Corp. (collectively, the “Parties”) respectfully file this Joint Motion to Amend the Docket Control Order and would show the Court as follows: Per the Amended Docket Control Order, the current deadline for the Parties to file Joint Pretrial Order, Joint Proposed Jury Instructions, Joint Proposed Verdict Form, Updated Exhibit Lists, Updated Witness Lists, and Updated Deposition Designations is May 28, 2025. Dkt. No. 212 at 2. The Parties request a brief two-day extension of this deadline to May 30, 2025. The deadline for responses to motions *in limine* shall remain the same as that set forth in the Docket Control Order, which is May 28, 2025. *Id* at 2.

Good cause exists for this brief extension because it will allow the Parties to further confer and narrow the disputes for the Court. The Parties represent that this motion is not filed for the purposes of delay and would be in the interest of justice. The Parties further represent this will not affect any other starred dates in the Docket Control Order. This motion is agreed, and the Parties are filing it jointly.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion.

FILED UNDER SEAL

Dated: May 28, 2025,

Respectfully submitted,

/s/ Marc Fenster

CA State Bar No. 181067
Email: mfenster@raklaw.com
Reza Mirzaie
CA State Bar No. 246953
Email: rmirzaie@raklaw.com
Brian Ledahl
CA State Bar No. 186579
Email: bledahl@raklaw.com
Ben Wang
CA State Bar No. 228712
Email: bwang@raklaw.com
Adam Hoffman
CA State Bar No. 218740
Email: ahoffman@raklaw.com
Dale Chang
CA State Bar No. 248657
Email: dchang@raklaw.com
Paul Kroeger
CA State Bar No. 229074
Email: pkroeger@raklaw.com
Neil A. Rubin
CA State Bar No. 250761
Email: nrubin@raklaw.com
Kristopher Davis
CA State Bar No. 329627
Email: kdavis@raklaw.com
James S. Tsuei
CA State Bar No. 285530
Email: jtsuei@raklaw.com
Philip Wang
CA State Bar No. 262239
Email: pwang@raklaw.com
Jason M. Wietholter
CA State Bar No. 337139
Email: jwietholter@raklaw.com
Qi (Peter) Tong
TX State Bar No. 24119042
Email: ptong@raklaw.com

RUSS AUGUST & KABAT
12424 Wilshire Blvd., 12th Floor
Los Angeles, CA 90025

/s/ Nicholas Mathews

Nicholas Mathews
Texas State Bar No. 24085457
nmathews@McKoolSmith.com
Alexander J. Chern
Texas State Bar No. 24109718
achern@McKoolSmith.com
Clare Churchman
Texas State Bar No. 24132041
cchurchman@mckoolsmith.com
MCKOOL SMITH, P.C.
300 Crescent Court Suite 1500
Dallas, TX 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

Kevin Hess
Texas State Bar No. 24087717
khess@mckoolsmith.com
MCKOOL SMITH, P.C.
303 Colorado Street, Suite 2100
Austin, TX 78701
Telephone: (512) 692-8752

Deron R. Dacus
State Bar No. 00790553
ddacus@dacusfirm.com
THE DACUS FIRM, PC
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Telephone: (903) 705-1117
Facsimile: (903) 581-2543

Attorneys For AT&T

FILED UNDER SEAL

Telephone: 310-826-7474

Andrea L. Fair

MILLER FAIR HENRY PLLC

1507 Bill Owens Parkway

Longview, Texas 75604

Telephone: 903-757-6400

andrea@millerfairhenry.com

Attorneys for Plaintiff

Headwater Research LLC

FILED UNDER SEAL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on May 28, 2025.

/s/ Nicholas Mathews
Nicholas Mathews

CERTIFICATE OF CONFERENCE

I hereby certify that on May 28, 2025, counsel for Defendants conferred with counsel for Plaintiff and that this Joint Motion is unopposed.

/s/ Nicholas Mathews
Nicholas Mathews